

**SAO**

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*Attorneys for Defendants,*  
County of Clark and Victor Zavala

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

BRIAN BORENSTEIN, an individual,

Plaintiff,

vs.

THE ANIMAL FOUNDATION, a domestic  
nonprofit corporation; COUNTY OF CLARK,  
a political subdivision of the State of Nevada;  
SUNRISE HOSPITAL AND MEDICAL  
CENTER, LLC, a foreign limited-liability  
company domiciled in Delaware; CARLY  
SCHOLTEN, an individual; VICTOR  
ZAVALA, an individual; and ROE BUSINESS  
ENTITIES 1-5; and DOE INDIVIDUALS 1-5,

Defendants,

CASE NO.: 2:19-CV-00985-APG-DJA

**STIPULATION AND ORDER TO EXTEND  
TIME FOR DEFENDANTS COUNTY OF  
CLARK AND VICTOR ZAVALA TO  
RESPOND TO [206] PLAINTIFF'S  
OPPOSITION TO MOTION TO DISMISS  
SECOND AMENDED COMPLAINT**

**(FIRST REQUEST)**

Defendants, COUNTY OF CLARK and VICTOR ZAVALA (collectively, the "County Defendants"), by and through their counsel, Jonathan D. Blum, Esq., of the law firm Wiley Petersen, and Plaintiff, BRIAN BORENSTEIN, by and through his counsel, Raelene K. Palmer, Esq. of The Palmer Law Firm, P.C., and Robert S. Melcic, Esq., hereby stipulate and request the Court to extend the deadline for the County Defendants to respond to [ECF 206] Plaintiff's Opposition to Motion To Dismiss Second Amended Complaint by two days from Friday, October 8, 2021 to Tuesday, October 12, 2021.

Counsel for the County Defendants have requested this short extension due to various work obligations and the fact that it will be difficult to substantively respond to the 25-page Opposition in

five business days. This stipulated extension is for good cause, and not for improper delay.

DATED this 6 day of October 2021.

**THE PALMER LAW FIRM, P.C.**

By: Raelene K. Palmer  
Raelene K. Palmer, Esq.  
Nevada Bar No. 8602  
5550 Painted Mirage Road, Suite 320  
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Robert S. Melcic, Esq.  
Nevada Bar No. 14923  
4930 Mar Vista Way  
Las Vegas, Nevada 89121

*Attorneys for Plaintiff,  
Brian Borenstein*

DATED this 6 day of October 2021.

**WILEY PETERSEN**

By: Jonathan D. Blum  
Jonathan D. Blum, Esq.  
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1050 Indigo Drive, Suite 200B  
Las Vegas, Nevada 89145

*Attorneys for Defendants,  
County of Clark and Victor Zavala*

**ORDER**

IT IS SO ORDERED.

DATED: October 8, 2021

  
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ANDREW P. GORDON  
UNITED STATES DISTRICT JUDGE